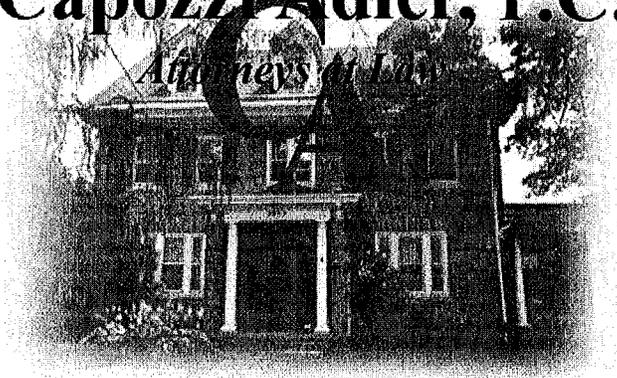


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June 10, 2016

NATIONAL LABOR RELATIONS BOARD

c/o Executive Secretary

National Labor Relations Board

1099 14th Street, NW

Washington, DC 20570-0001

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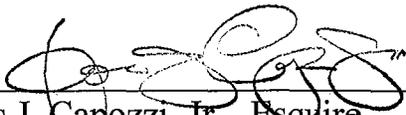
RE: REQUEST TO RECONSIDER JUNE 3, 2016 DENIAL OF EMPLOYER'S
REQUEST TO SUPPLEMENT *NUNC PRO TUNC* THE MARCH 15, 2016
REQUEST FOR RECONSIDERATION OF THE ORDER OF FEBRUARY
17, 2016 AFFIRMING DISMISSAL OF RM PETITION
Case 04-RM-145463 – Linwood Care Center
Our Matter No. 793-15

Dear Members of the Board:

On behalf of our client, CPL (Linwood) LLC d/b/a Linwood Care Center, the Employer, we are filing this Request for Reconsideration of the June 3, 2016 denial of the Employer's Request to Supplement *nunc pro tunc* the March 15, 2016 Request for Reconsideration previously filed in the above-captioned case. The June 3, 2016 denial is based on the end of the briefing period in the case. The June 3, 2016 denial does not reflect the Board's consideration or determination of the *nunc pro tunc* bases alleged in

the Employer's submittal for acceptance of the Supplement. Since those bases support supplementation of the Record *nunc pro tunc* based on the concealment of information relating to potential bias of the Regional Director, the Board should vacate its denial of June 3, 2016 and include the Supplement in its determination of the Employer's Request for Reconsideration of March 15, 2016. *See also: Williams v. Pennsylvania, __ U.S. __*, Case No. 15-5040 (Slip Opinion of June 9, 2016) (Discussing the Due Process entitlement to determinations by an unbiased decision-maker).

Respectfully submitted this 10th day of June, 2016.

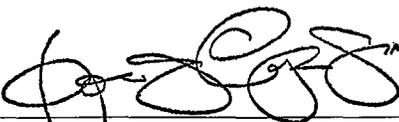


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[Attorneys for Employer]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of June 2016, a true and correct copy of the foregoing REQUEST TO RECONSIDER JUNE 3, 2016 DENIAL OF EMPLOYER'S REQUEST TO SUPPLEMENT *NUNC PRO TUNC* THE MARCH 15, 2016 REQUEST FOR RECONSIDERATION OF THE ORDER OF FEBRUARY 17, 2016 AFFIRMING DISMISSAL OF RM PETITION was served on the following by the method designated:

- Diane Delaney, Administrator
CPL (Linwood) LLC d/b/a Linwood Care Center
201 New Road & Central Avenue
Linwood, NJ 08221 (BY EMAIL)
- Jay Jaffe, Senior Managing Counsel
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DATE: June 10, 2016